

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: :
Donna L. Streiff : Bankruptcy No. 22-22034-GLT
Debtor : Chapter 13
:
Select Portfolio Servicing, Inc as Servicer for : Related to Document No.15
U.S. Bank National Association, not in its : Hearing Date and Time: 12/05/2022 at
individual capacity but solely as indenture trustee, : 1:00 PM
for the holders of the CIM Trust 2021-R3, :
Mortgage-Backed Notes, Series 2021-R3 :
Movant :
:
v. :
:
Donna L. Streiff :
Ronda J. Winnecour- Trustee :
Respondents (if none, then "No Respondent") :

OBJECTION TO CONFIRMATION OF PLAN

PLEASE TAKE NOTICE that Select Portfolio Servicing, Inc as servicer for U.S. Bank National Association, not in its individual capacity but solely as indenture trustee, for the holders of the CIM Trust 2021-R3, Mortgage-Backed Notes, Series 2021-R3 ("Secured Creditor"), the holder of a mortgage on real property of the Debtors, located at 17 Weible Street, Pittsburgh PA 15223 by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor's Plan does not provide for the arrears claim of Secured Creditor. The objecting creditor is due arrears of approximately \$44,444.30, as set forth in Proof of Claim 2-1 filed on November 8, 2022. Debtor's plan indicates a total of \$0.00 is to be paid to Secured Creditor.
2. Debtor's Plan does not provide for the regular monthly mortgage payment of \$886.29.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: November 17, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: :
Donna L. Streiff : Bankruptcy No. 22-22034-GLT
Debtor : Chapter 13
:
Select Portfolio Servicing, Inc as Servicer for : Related to Document No.15
U.S. Bank National Association, not in its : Hearing Date and Time: 12/05/2022 at
individual capacity but solely as indenture trustee, : 1:00 PM
for the holders of the CIM Trust 2021-R3, :
Mortgage-Backed Notes, Series 2021-R3 :
Movant :
:
v. :
:
Donna L. Streiff :
Ronda J. Winnecour- Trustee :
Respondents (if none, then "No Respondent") :

CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

I certify under penalty of perjury that I caused to be served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 16, 2022.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading "Service by NEF," and the full name and complete postal address for each party served by mail, is listed under the heading "Service by First-Class Mail."

EXECUTED ON: November 17, 2022

FRIEDMAN VARTOLO, LLP.

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esquire
FRIEDMAN VARTOLO LLP
Attorneys for Movant
1325 Franklin Avenue, Suite 160
Garden City, New York 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

PAWB Local Form 7 (07/13)

Service by NEF

Christopher M. Frye

Steidl & Steinberg
Suite 2830 Gulf Tower
707 Grant Street
Pittsburgh, PA 15219

Debtors' Counsel

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Trustee

Office of the United States Trustee
Liberty Center
1001 Liberty Avenue, Suite 970
Pittsburgh, PA 15222

U.S. Trustee

Service by First-Class Mail

Donna L. Streiff

22 Spring Street
Pittsburgh, PA 15223

Debtor